

1 HOGAN LOVELLS US LLP
2 Erin N. Brady (CA 215038)
3 erin.brady@hoganlovells.com
4 1999 Avenue of the Stars, Suite 1400
5 Los Angeles, California 90067
6 Telephone: (310) 785-4600
7 Facsimile: (310) 785-4601

8 – and –

9 M. Hampton Foushee (*pro hac vice*)
10 hampton.foushee@hoganlovells.com
11 875 Third Avenue
12 New York, New York 10022
13 Tel: (212) 918-3000
14 Fax: (212) 918-3100

15 *Counsel for Party in Interest*
16 *esVolta, LP.*

17 UNITED STATES BANKRUPTCY COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 **In re:**

21 **PG&E CORPORATION**

22 **- and -**

23 **PACIFIC GAS AND**
24 **ELECTRIC COMPANY,**

25 **Debtors.**

26 Bankruptcy Case
27 No. 19 – 30888 (DM)
28 Chapter 11
(Lead Case)
(Jointly Administered)

29 **NOTICE OF CONTINUED HEARING ON**
30 **ESVOLTA, LP'S SAFE HARBOR**
31 **MOTION AND MOTION TO FILE UNDER**
32 **SEAL ORIGINALLY SET FOR HEARING**
33 **ON APRIL 10, 2019 AT 1:30 PM**

- 34 Affects PG&E Corporation
35 Affects Pacific Gas and Electric
36 Company
37 Affects both Debtors

38 ***All papers shall be filed in the Lead**
39 **Case, No. 19-30088 (DM)**

40 Hearing Date: **April 24, 2019**
41 Time: **9:30 a.m.**
42 Courtroom: Hon. Dennis Montali
43 450 Golden Gate Avenue
44 16th Floor, Courtroom 17
45 San Francisco, CA 94102
46 Objections Due: **April 17, 2019, 4:00 p.m.**

1 **PLEASE TAKE NOTICE** that the hearing on the Motion and Memorandum for Entry of
2 an Order Confirming Safe Harbor Protection Under 11 U.S.C. §§ 362(b)(6) and 556 (the “Safe
3 Harbor Motion”) and the Motion to File Certain Contracts and Related Filings Under Seal (the
4 “Motion to File Under Seal,” and together with the Safe Harbor Motion, the “Motions”) filed by
5 esVolta, LP (“esVolta”), previously scheduled for April 10, 2019 at 1:30 p.m. (Pacific Time), has
6 been continued to **April 24, 2019 at 9:30 a.m.** (Pacific Time) and will be held before the
7 Honorable Dennis Montali, United States Bankruptcy Judge, in Courtroom 17, United States
8 Bankruptcy Court for the Northern District of California, 450 Golden Gate Avenue, 16th Floor,
9 San Francisco, California, 94102.

10 **PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Motions
11 shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local
12 Bankruptcy Rules for the Northern District of California, shall be filed with the Bankruptcy Court
13 in accordance with the customary practices of the Bankruptcy Court, and shall be served on (i) the
14 Chambers of the Honorable Judge Dennis Montali, United States Bankruptcy Court for the
15 Northern District of California, 450 Golden Gate Avenue, 16th Floor, Courtroom 17, San
16 Francisco, CA 94102; (ii) counsel for the Debtors, Weil, Gotshal & Manges, 767 Fifth Avenue,
17 New York, NY 10153-0119, Attn: Stephen Karotkin, Jessica Liou and Matthew Goren, and
18 Keller & Benvenutti LLP, 650 California Street, Suite 1900, San Francisco, CA 94108, Attn:
19 Tobias S. Keller, Jane Kim; (iii) the Office of the United States Trustee, 450 Golden Gate
20 Avenue, 5th Floor, Suite #05-0153, San Francisco, CA, 94102, Attn: James L. Snyder, Timothy
21 Laffredi; (iv) counsel for the Official Committee of Unsecured Creditors, Milbank LLP, 55
22 Hudson Yards, New York, NY 10001-2163, Attn: Dennis F. Dunne, Samuel A. Khalil; (v)
23 counsel for the Official Committee of Tort Claimants, Baker & Hostetler, LLP, 11601 Wilshire
24 Blvd., Suite 1400, Los Angeles, CA 90025-0509, Attn: Eric E. Sagerman, Lauren T. Attard; (vi)
25 counsel for the Ad Hoc Committee of Senior Unsecured Noteholders, Akin Gump Strauss Hauer
26 & Field LLP, 580 California Street, Suite 1500, San Francisco, CA 94104, Attn: Ashley Vinson
27 Crawford; (vii) counsel for Fire Victim Creditors, Danko Meredith, 333 Twin Dolphin Drive,
28 Suite 145, Redwood Shores, CA 94065, Attn: Michael S. Danko, Kristine K. Meredith, Shawn R.

1 Miller, and Corey, Luzaich, De Ghetaldi & Riddle LLP, 700 El Camino Real, PO Box 669,
2 Milbrae, CA 94030-0669, Attn: Dario de Ghetaldi, Amanda L. Riddle, Steven M. Berki, Sumble
3 Manzoor; (viii) counsel for the Ad Hoc Committee of Unsecured Tort Claimant Creditors, DLA
4 Piper LLP (US), 2000 Avenue of the Stars, Suite 400 North Tower, Los Angeles, CA 90067-
5 4704, Attn: Eric Goldberg, David Riley; (ix) counsel for the Ad Hoc Group of Institutional Par
6 Bondholders, Proskauer Rose LLP, Eleven Times Square, New York, NY 10036-8299, Attn:
7 Martin J. Bienenstock, Brian S. Rosen, Maja Zerjal; (x) counsel for esVolta, Hogan Lovells US
8 LLP, 1999 Avenue of the Stars, Suite 1400, Los Angeles, California 90067, Attn: Erin N. Brady;
9 and (xii) all parties requesting notice in these chapter 11 cases pursuant to Rule 2002 of the
10 Federal Rules of Bankruptcy Procedure, so as to be so filed or received no later than **4 p.m.**
11 **(Pacific Time) on April 17, 2019.**

12 **PLEASE TAKE FURTHER NOTICE** that reply papers in further support of the
13 Motions must be filed and served no later than **12:00 p.m. (Pacific Time) on April 22, 2019.**

14 **PLEASE TAKE FURTHER NOTICE** that failure to properly file and serve an
15 opposition may be deemed consent to the relief requested in the Motions or a waiver of any right
16 to oppose them.

17
18
19
20
21
22
23
24
25
26
27
28

1 Dated: April 3, 2019

HOGAN LOVELLS US LLP

2 By: /s/ Erin N. Brady

3 Erin N. Brady (CA 215038)
erin.brady@hoganlovells.com
4 1999 Avenue of the Stars, Suite 1400
Los Angeles, California 90067
Telephone: (310) 785-4600
Facsimile: (310) 785-4601

5 – and –

6 M. Hampton Foushee (*pro hac vice*)
7 hampton.foushee@hoganlovells.com
8 875 Third Avenue
9 New York, New York 10022
Telephone: (212) 918-3000
Facsimile: (212) 918-3100

10
11 **COUNSEL FOR PARTY IN INTEREST**
12 **ESVOLTA, LP**